

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
:  
UNITED STATES OF AMERICA : CONSENT PRELIMINARY ORDER  
- v. - : OF FORFEITURE/  
IRINIA DILKINSKA, : MONEY JUDGMENT  
Defendant. : S17 17 Cr. 630 (ER)  
:  
----- x

WHEREAS, on or about \_\_\_\_\_, IRINA DILKINSKA (the “Defendant”), was charged in a Superseding Information, S17 17 Cr. 630 (ER) (the “Information”), with conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 371 (Count One) and conspiracy to commit money laundering in violation of Title 18, United States Code, Section 371 (Count Two);

WHEREAS, the Information included a forfeiture allegation as to Count One, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count One of the Information;

WHEREAS, the Information included a forfeiture allegation as to Count Two, seeking forfeiture to the United States, of any and all property, real and personal, involved in the offense charged in Count Two of the Information, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Count Two of the Information;

WHEREAS, on or about \_\_\_\_\_, the Defendant pled guilty to Counts One and Two, pursuant to a plea agreement with the Government, wherein the Defendant

admitted the forfeiture allegation with respect to Count One and Two agreed to forfeit to the United States, a sum of money equal to \$111,440,000 in United States currency as a result of the commission of the offenses charged in Counts One and Two of the Information (the “Money Judgment”);

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$111,440,000 in United States currency, representing the amount of proceeds traceable to the offenses charged in Counts One of the Information that the Defendant personally obtained and the property involved in the offense charged in Count Two of the Information, for which the Defendant is jointly and severally liable with her co-defendant, Mark Scott, to the extent a forfeiture money judgment is entered against Mark Scott in this case; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Count One of the Information that the Defendant personally obtained and property involved in the offense charged in Count Two of the Information cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney, KEVIN MEAD of counsel, and the Defendant, and her counsel, JOHN PHILLIP BUZA, Esq., that:

1. As a result of the offenses charged in Counts One and Two of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$111,440,000 in United States currency (the “Money Judgment”), representing the amount of proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained and property involved in the offense charged in Count Two of the Information, for which the Defendant

is jointly and severally liable with her co-defendant, Mark Scott, to the extent a forfeiture money judgment is entered against Mark Scott in this case, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, IRINIA DILKINSKA, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Department of Treasury, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number

4. The United States Department of Treasury or its designee shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to 21 U.S.C. § 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: /s/ Kevin Mead  
KEVIN MEAD  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2211

11/1/2023  
DATE

IRINA DILKINSKA

By: IRINA DILKINSKA

11/9/23  
DATE

By: JOHN PHILLIP BUZA, ESQ.  
Attorney for Defendant  
233 Broadway (Ste 900)  
New York, NY 10279

11/9/23  
DATE

SO ORDERED:

HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE

11/9/23  
DATE